

EXHIBIT 6

0001

1 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
2 IN AND FOR THE COUNTY OF SAN FRANCISCO

3
4 SOUTH TAHOE PUBLIC UTILITY
5 DISTRICT,

6 Pl a i n t i f f ,

7 vs.

8 ATLANTIC RICHFIELD COMPANY
9 ("ARCO"); et al . ,

10 Defendants.

NO. 999128

11 COMMUNITIES FOR A BETTER
12 ENVIRONMENT, a Cal i f o r n i a
13 Non-Profit Corporation; on
14 behalf of the General Public,

15 Pl a i n t i f f ,

16 vs.

17 UNOCAL CORPORATION, a Del aware
18 Corporation, et al . ,

19 Defendants.

NO. 997013

20 DEPOSITION OF ALAN R. HERSIG

21 Date: September 29, 2000

22 Time: 8:37 a.m.

23 Location: Sedgwick, Detert, Moran & Arnold
24 One Embarcadero Center, Suite 1600
25 San Francisco, California 94111

 JOSHUA W. SCOTT, CSR #4328
 LOTUS REPORTERS
 Certified Shorthand Reporters
 3142 Clayton Road
 Concord, California 94519
 (925) 686-2100

0016

1 A. In Europe?

2 Q. Yes, during that time period.

3 A. I had skilled technologists, chemists,
4 engineers, marketing and business management people who
5 were actually responsible for the programs.

6 Q. By the time you came back -- well, I'm sorry.
7 Before I ask that question, let me ask a different one.

8 Who, in your mind, was the person with the
9 most hands-on operational responsibilities for MTBE in
10 Europe during the period that you were there?

11 A. Probably the Vice President of Operations.

12 Q. Who was that?

13 A. His name was Jim Jackson.

14 Q. Is Mr. Jackson still with the company?

15 A. No.

16 Q. Do you know where he is?

17 A. I believe he lives in England but I don't know
18 the specifics.

19 Q. And is the VP for Operations a senior
20 executive position within the company, or was it at the
21 time?

22 A. Within Arco Chemical Europe, it was.

23 Q. And he reported to you?

24 A. Yes, he did.

25 MR. SHER: Let me mark as Exhibit 1 this

0017

1 document. This is an Arco Chemical pamphlet copy of
2 MTBE -- the title is "MTBE. A key ingredient for
3 environmentally cleaner gasoline."

4 (Whereupon, a 7-page document entitled "MTBE"
5 was marked as Plaintiff's Exhibit 1 for
6 identification.)

7 MR. SHER: Q. Would you like a moment to look
8 at this off the record?

9 A. I would, indeed.

10 MR. SHER: Let's go off the record.

11 THE VIDEOGRAPHER: The time is 8:54 a.m.
12 We'll go off the record.

13 (Whereupon, the parties went off the record.)

14 THE VIDEOGRAPHER: The time is 8:56 a.m.
15 We're now back on the record.

16 MR. SHER: Q. Mr. Hersig, have you ever seen
17 this document before?

18 A. Not in my memory.

19 Q. You asked, while we were off the record,
20 whether there was a date on it. I don't believe there
21 is. But on the last page in the section that's titled
22 "What about the future?", there's a reference that says
23 "Debate is currently under way in the US Congress on
24 amendments to the Clean Air Act."

25 Do you see that reference?

0018

1 A. I'm sorry. I'm not on the right page.

2 Q. There you go. On the very last page.

3 A. Yes.

4 Q. Does that suggest to you a time frame for this
5 document?

6 A. Not really.

7 Q. The reference on the front page of the
8 document where it says, "MTBE, a key ingredient for
9 environmentally cleaner gasoline," is that consistent
10 with your recollection of a theme by which Arco Chemical
11 promoted MTBE?

12 A. In general terms, yes.

13 Q. Was that true both while you were in Europe
14 and after you came back to the United States?

15 A. I really can't recall when I was in Europe but
16 certainly when I was in the US, this was, generally
17 speaking, an important theme.

18 Q. And was the term "environmentally cleaner
19 gasoline" one that Arco Chemical used during the entire
20 time that you were the CEO of the company?

21 A. I can't answer that.

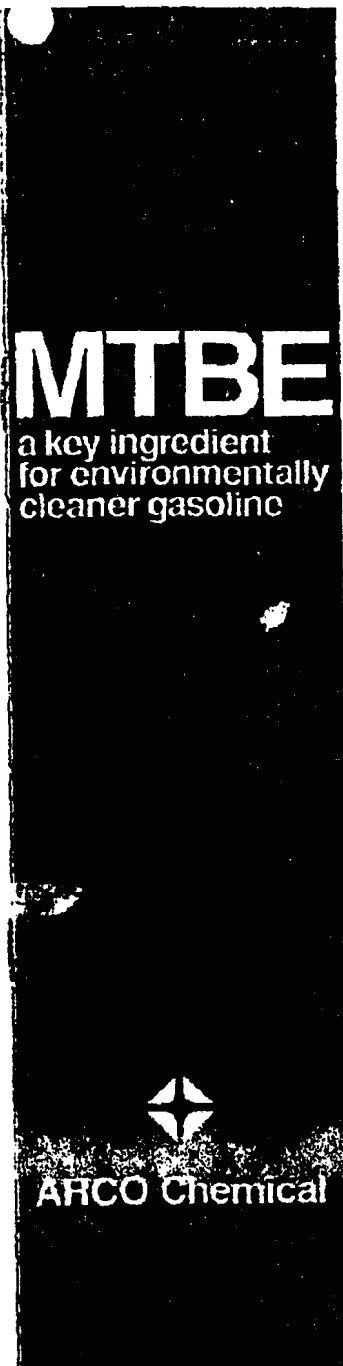
22 Q. Can you recall a time at which it was not
23 used?

24 A. I cannot.


25 Q. Is your uncertainty about your recollection

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PLF's Ex. 1 For Ident
Hersis
9-29-00
SCOTT, C.S. #4522



MTBE
a key ingredient
for environmentally
cleaner gasoline



ARCO Chemical

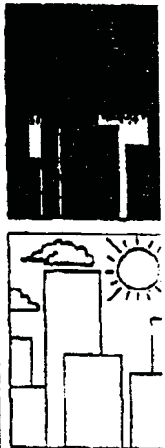


EXHIBIT 32

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What is MTBE?

MTBE is shorthand for Methyl Tertiary Butyl Ether. It belongs to a family of chemical compounds known as ethers but is more commonly referred to as an oxygenate. It has been used by the oil refining industry to enhance the octane* of gasoline since 1973. MTBE has been widely used in the U.S. as a substitute for leaded octane enhancers in gasoline, and also to improve the driving performance of the super premium gasolines. It is now produced in many oil refineries and chemical plants in the U.S. and throughout the world.

What are oxygenates?

Oxygenates are a class of high octane blendstocks for gasoline that also contain oxygen which promotes cleaner burning during gasoline combustion. Oxygenates can be broken down into two general categories: alcohols (such as methanol and ethanol) and ethers (MTBE). Both types of oxygenates promote cleaner burning. However, the ethers are less volatile** than the alcohols and are fully compatible with standard gasoline.

More recently, oxygenates have been recognized for their capability of reducing the pollutants emitted from the car's exhaust. They are now a required component of gasoline in a growing number of high pollution areas that have implemented Clean Air Programs. Gasolines that contain high levels of oxygenates for this purpose are commonly referred to as "oxygenated fuels."

*Octane is one of the major gasoline properties that influence your car's performance.

**Volatility is a measure of gasoline's tendency to vaporize in air and produce emissions.

LAN0607979**How does MTBE in gasoline help clean the air?**

As normally produced, most gasoline is made from only hydrocarbons, a fuel-type material that contains only hydrogen and carbon. Oxygen necessary for combustion of the gasoline is normally introduced by mixing air with the fuel just prior to being fed into the car's engine. Since MTBE already contains some oxygen, gasoline blended with MTBE will increase the amount of oxygen in the air/fuel mixture. The additional oxygen promotes cleaner burning, resulting in reduction of two of the main pollutants in the car's exhaust: carbon monoxide (CO), and unburned gasoline (hydrocarbons).

MTBE also helps reduce other tailpipe pollutants such as particle emissions (which can contribute to a visible brown cloud), and emissions of benzene and other aromatics substances. In addition to containing oxygen, MTBE also provides oil refiners with the flexibility to improve the overall environmental quality of the gasoline. These improvements in gasoline combined with the oxygen from MTBE result in an even greater reduction of pollutants from the car; more than that realized from the oxygen addition alone.

Why is MTBE only "now" being required in gasoline?

In recent years, MTBE (and other oxygenates) has become a required component of gasoline in a number of metropolitan regions which have severe or persistent air quality problems associated with carbon monoxide (CO) emissions from automobiles. The first such oxygenated fuels program began in January, 1988 in Denver, Colorado. Since that time, other Clean Air Programs using oxygenated fuels have been implemented in Phoenix, Las Vegas, Reno

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and Albuquerque and are being considered in more areas today. MTBE is now widely recognized by governmental agencies and the petroleum industry as an effective, economical means of improving air quality.

Even more recently, MTBE has been used as a key ingredient in the production of "low polluting" gasolines being produced for regions with high incidences of the ozone and smog types of air pollution. Besides reducing CO emissions, the use of MTBE in gasoline also reduces the amount of other pollutants in the car's exhaust which contribute to the formation of ozone and smog. For this type of air pollution, many refiners are now introducing a cleaner burning grade of gasoline using MTBE.

Will MTBE affect my car's performance?

Other than its beneficially high octane and oxygen content, MTBE is similar in quality to the other blendstocks used in the production of gasoline. Prior to the development of regional Clear Air Programs that require the use of cleaner burning oxygenated fuels for improved air quality, MTBE had been widely used for enhancing the octane and the driving performance of premium and super premium gasolines. These grades of gasoline represent the highest quality gasoline produced by oil refiners.

Although many automakers have used the "fuel section" of the car's operating manual to alert owners about many of the oxygenates that are sometimes used in gasoline, automakers had previously found it unnecessary to include the non-controversial MTBE. Now with a heightened awareness spurred by the oxygenated fuel programs, many automakers are referencing MTBE in manuals as an approved component in gasoline. Most recently, General Motors has

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advocated the use of all oxygenated fuels in these high pollution areas.

Refer to the fuel section of your car's owners manual for more information on the use of the various oxygenated fuels in your particular car.

How does it perform in small engine equipment?

Because of MTBE's relatively high stability and low sensitivity to moisture, properly formulated oxygenated fuels made with MTBE will not hinder performance of small engines or be effected by the climatic conditions for which the equipment was intended.

Refer to the fuel section of your owners manual for more information on the use of the various oxygenated fuels in your particular equipment and engine.

How much MTBE is there in a gallon of gasoline?

When refiners manufacture gasolines with MTBE, the amount of MTBE used typically varies from about 3 to 15 percent by volume. The exact amount depends on the octane requirements of the particular gasoline blend and/or the pollution-reducing properties desired. For Clean Air Programs, the required concentrations are generally in the range of 11 to 15 percent by volume. This amount of MTBE will add 2 to 2.7 percent oxygen (by weight) to the fuel. Higher levels generally provide little additional reduction in pollutants.

Which refiners and marketers use it in their gasoline?

Virtually every major refiner and marketer of gasoline in the U.S. uses MTBE somewhere in its gasoline manufacturing and/or supply system.

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Who manufactures MTBE?

Most oil companies in the U.S. currently are or plan to manufacture some MTBE in their refinery operations. These include:

Amoco	Crown	Kerr McGee
ARCO	Diamond	Marathon
Ashland	Shamrock	Mobil
Champlin	Exxon	Phillips
Chevron	Fina	Sun
Citgo	Hess	Texaco
Coastal	Hill	Valero
Conoco		

Supplemental supplies are manufactured by chemical companies such as:

ARCO Chemical	Lyondell
Champlain	Petrochemical
Petrochemical	Texaco Chemical
Exxon Chemical	Texas Petrochemical

Numerous other oil refiners and chemical companies have announced intentions to build more MTBE manufacturing facilities to meet the growing demand for this product.

How do I know if I'm buying gasoline with MTBE?

In high-pollution regions where oxygenated fuels are required to reduce carbon monoxide emissions, government and industry are encouraging or requiring gasoline stations to label the gasoline dispenser pumps with the type of oxygenate used. This is being done to assure consumers that they are purchasing a qualified gasoline for that region's Clean Air Program. Outside these Clean Air Program areas where oxygenated fuels are not a requirement, labeling gasoline containing MTBE is unnecessary.

LAN0607983**Will I pay more for gasolines containing MTBE (or other oxygenates)?**

Most studies have shown that the use of oxygenated fuels is more cost effective than many of the other available options for reducing air pollution. Generally, the use of MTBE has little effect on the production cost of high octane premium gasolines, but may contribute to a minor cost increase in the regular grades of gasoline. Whether this results in a price increase to the consumer depends on competitive pressures in the gasoline marketplace.

What about the future?

Debate is currently underway in the U.S. Congress on amendments to the Clean Air Act. Included in some of the proposed amendments are provisions to use oxygenates to help improve air quality in severely polluted regions of the country.

Individual states and metropolitan governments are also looking at fuel modification options that will reduce emissions and provide cleaner air. Oxygenated fuels are one of the major options being considered.

More refiners are also expected to follow the currently developing trend of introducing "low polluting" grades of gasoline in market regions that are experiencing high levels of ozone and smog. A key ingredient to making these gasolines is MTBE and the other fuel-type ethers.